

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re CONSTAR INT'L INC. SECURITIES)	Master File No. 03cv05020
LITIGATION)	
)	<u>CLASS ACTION</u>
<hr/> This Document Relates To:)	
)	LEAD PLAINTIFFS' MOTION TO
ALL ACTIONS.)	REMOVE BERNSTEIN LIEBHARD &
)	LIFSHITZ, LLP AS CO-LEAD COUNSEL
<hr/>)	

Lead Plaintiffs Ameesh Bhandari and Randolph Redstone (“Lead Plaintiffs”) hereby move this Court for an Order removing the law firm of Bernstein Liebhard & Lifshitz, LLP (“Bernstein”) as co-lead counsel.

This motion is made on the grounds that: (1) Lead Plaintiffs, pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v), do not wish to retain Bernstein as co-lead counsel in this action; and (2) the continued involvement of Bernstein in this matter will lead to unnecessary inefficiencies, duplication and costs.

This motion is based upon the memorandum of points and authorities in support thereof, the declarations of lead plaintiffs Ameesh Bhandari and Randolph Redstone and their counsel Andrew J. Brown, the pleadings and files herein and such other written or oral argument as may be presented to the Court.

DATED: January 11, 2006

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
WILLIAM S. LERACH
STEVEN W. PEPICH
ANDREW J. BROWN
BRIAN O. O’MARA

s/ Andrew J. Brown

ANDREW J. BROWN

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiffs

LAW OFFICES BERNARD M. GROSS, P.C.
DEBORAH R. GROSS
100 Penn Square East, Suite 450
Juniper and Market Streets
Philadelphia, PA 19107
Telephone: 215/561-3600
215/561-3000 (fax)

Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Andrew J. Brown

ANDREW J. BROWN

LERACH COUGHLIN STOIA GELLER

RUDMAN & ROBBINS LLP

655 West Broadway, Suite 1900

San Diego, CA 92101

Telephone: 619/231-1058

619/231-7423 (fax)

E-mail: andrewb@lerachlaw.com

Mailing Information for a Case 2:03-cv-05020-EL

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **MICHAEL E. BAUGHMAN**
michael.baughman@dechert.com lisa.ricchezza@dechert.com
- **STEPHANIE M. BEIGE**
beige@bernlieb.com
- **ANDREW J. BROWN**
andrewb@lcsr.com
- **STEVEN B. FEIRSON**
steven.feirson@dechert.com
- **ROBERT P. FRUTKIN**
rpf@bernardmgross.com
- **DEBORAH R. GROSS**
debbie@bernardmgross.com
- **SUSAN R. GROSS**
susang@bernardmgross.com
- **JEFFREY M. HABER**
haber@bernlieb.com
- **MARC S. HENZEL**
mhenzel182@aol.com
- **MICHAEL L. KICHLINE**
michael.kichline@dechert.com lisa.ricchezza@dechert.com;michael.kichline@dechert.com
- **BRIAN O. O'MARA**
briano@lcsr.com
- **STEVEN W. PEPICH**
stevep@lcsr.com
- **MARC J. SONNENFELD**
msonnenfeld@morganlewis.com pfiggs@morganlewis.com
- **SCOTT A. THOMPSON**
scott.thompson@dechert.com gerilene.marshall@dechert.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

JILL BAISINGER

MORGAN LEWIS AND BOCKIUS LLP
1701 MARKET STREET
PHILADELPHIA, PA 19103-2921

DANIEL S. DROSMAN

MILBERG WEISS BERSHAD HYNES & LERACH LLP
401 B STREET
SUITE 1700
SAN DIEGO, CA 92101

KAREN PIESLAK POHLMANN

MORGAN, LEWIS & BOCKIUS LLP
1701 MARKET STREET
PHILADELPHIA, PA 19103-2921

DARREN J. ROBBINS

BERNSTEIN LIEBHARD & LIFSHITZ, LLP
10 EAST 40TH ST.
NEW YORK, NY 10016

LAURA SABRINA STEIN

MILBERG WEISS BERSHAD HYNES & LERACH LLP
1845 WALNUT ST., 9TH FL
PHILADELPHIA, PA 19103

DIANE M. WELSH, ESQ

JAMS
1700 MARKET STREET
SUITE 2730
PHILADELPHIA, PA 19103